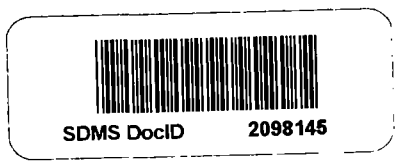
ORIGINAL

**Mallinckrodt Baker, Inc.**
222 Red School Lane
Phillipsburg, MJ 08865
U.S.A.
1-908-859-2151
Fax: 1-908-859-9318

*Contact:*
*Karen Burke*
*Dir., Environmental Remediation*
*Covidien*
*675 McDonnel Boulevard*
*Hazelwood, MO 63042*
*Direct Dial: (314) 654-5838*
*Fax: (314) 654-6486*
*e-mail: karen.burke@covidien.com*

October 24, 2007

**Via Federal Express**




Ms. Joan Martin-Banks (3HS62)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

**Re: Supplemental Submission of Information**
**Chem Fab Corporation Site, Doylestown, Bucks County, Pennsylvania**

Dear Ms. Martin-Banks:

This Supplemental Response is being submitted on behalf of Mallinckrodt Baker Inc., a New Jersey corporation which is a wholly-owned subsidiary of Mallinckrodt Inc., a Delaware corporation ("Mallinckrodt"), in response to an Information Request dated March 23, 2007 concerning the Chem Fab Corporation Site, Doylestown, Bucks County, Pennsylvania (herein after the "Site") and a Supplemental Information Request dated August 17, 2007.

MBI submitted its Response to the United States Environmental Protection Agency's ("EPA") Information Request on July 11, 2007. On July 25, 2007 and again on September 7, 2007, Steve Siegel, representatives of EPA and I teleconferenced to discuss issues related to MBI's response to the Information Request and the alleged nexus by which EPA claims it has jurisdiction to require MBI to respond to the Information Request. It is clear that CERCLA § 104(e)(2)(A) requires a response to such an Information Request only in the instance where materials "have been or are generated, treated, stored, or disposed of at a vessel or facility or transported to a vessel or facility."

It is incumbent upon EPA to show some nexus between a party being asked to provide information in response to an information request and the site or facility for which the information is being sought. EPA's duty to show some nexus becomes more important in this instance because the Chem Fab Site, unlike most other sites for which EPA issues information requests, was not a landfill or a storage/treatment facility, but instead was the home to one or more businesses that had nothing to do with disposing of

waste belonging to unrelated parties. However, there appears to be evidence that one or more of the businesses housed at the Chem Fab Site disposed of its own waste on the property.

In this instance, EPA has been unable to provide such nexus information. EPA has provided MBI with information relating to one partially full 5-gallon black plastic drum which EPA claims it identified at the Chem Fab Site during a removal that took place, upon information and belief, in 1994. EPA's analysis indicated that the so-called "drum" contained a 36% solution of hydrochloric acid ("HCl"). Information contained on the label has allowed MBI to determine that the HCl in the drum was produced in 1982. Further, it appears that the concentration is consistent with HCl that MBI produced in 1982. The label on the drum indicates that the drum was shipped to Chem Fab, apparently as product, since the contents were consistent with the container label. This single *product* drum (as opposed to a *waste* drum), apparently sold to Chem Fab in 1982, does not provide a nexus to the Site that would require MBI to respond to a § 104(e) request.[1]

MBI also requested that EPA provide any other information allegedly tying MBI to the Chem Fab Site. EPA has provided documents to MBI that, upon information and belief, were first produced to EPA and/or New Jersey DEP by Mrs. Marvin Jonas years ago that make no mention whatsoever of MBI (actually JT Baker during the time frame covered in the "Jonas documents"). Along with the Jonas documents, EPA produced redacted transcripts for interviews that took place *after* the 104(e) Information Request was first forwarded to MBI. Not one of the interviewees had knowledge of JT Baker, AETC or Chemical Leaman Tank Lines. Based on the Jonas documents and on the interview information, EPA still has not provided any nexus to the Site that would require MBI to respond to the Information Request or the Supplemental Information Request. And, if EPA determines that the single half-full five-gallon drum of HCl is MBI's only nexus to the Site (even though the material is *still* product, not waste, and could have been sold to Chem Fab by a distributor, and not even JT Baker), then EPA should consider MBI to be a *de micromis* PRP and should cease further investigations of MBI at this Site (or, since the material was not waste, EPA should not consider MBI a PRP at Chem Fab at all).

MBI also objects to the relevant time frame being utilized by EPA in its Request and Supplemental Request. Upon information and belief, EPA and/or other agencies conducted a removal at the Chem Fab site in 1994, so MBI's production and disposal activities from 1995 through 1999 could not be directly implicated in the disposal of waste at Chem Fab. In addition, Chem Fab's records that may be in existence for the 1995 through 1999 time frame contain information vastly different from records prior to 1995, and therefore would not help in understanding any information still in existence from the time prior to 1995.

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[1] Since this single five-gallon drum survived at Chem Fab for approximately twelve (12) years, it appears that Chem Fab bought very little of this product from JT Baker.

While firmly believing that it has no CERCLA nexus whatsoever to the Chem Fab Site, and without waiving any defenses or the objections set forth in its Response submitted to EPA on July 11, 2007, but still in keeping with the MBI's policy to cooperate in all investigations, MBI offers additional information as set forth below in response to EPA's Supplemental Request.

2. EPA has obtained information during the course of its investigation indicating that you may have produced waste, which was disposed of at the Site, and/or disposed of waste at the Site referenced in this letter. Please provide the following information regarding all wastes and by-products produced by you during the period 1965 to 1999:

2a. The nature of each "waste" (as the terms "waste" is defined in paragraph 6 of the definitions attached hereto) used including its chemical content, characteristics and physical state (i.e., liquid, solid, gas, or in the form of contaminated rages, cups, containers, scrap metal). Provide chemical analyses and Material Safety Data Sheets ("MSDS"). If these analyses are not available for the period 1965 through 1999, submit analyses for the time period closest to these dates and describe, in detail, any changes in the process(es) in which these wastes were produced that would affect the chemical analyses;

July 11, 2007 Response: During the "relevant time period" (from 1965 through 1999), MBI's waste would have included liquid and solid waste. Because of the wide range of chemicals manufactured over the years, MBI cannot with a reasonable degree of accuracy identify the chemical makeup of each waste or waste stream that it generated.

Supplemental Response: MBI no longer has records or corporate knowledge as to the nature of the waste streams for the time prior to 1995. MBI's waste manifests that have survived (from 1986 through 1994) include DOT-type descriptions of MBI's waste. This generic information is such that it does not tie the waste to a specific process that MBI used during that time frame, and MBI cannot determine what specific process generated the waste that is generically described on the surviving manifests. This information from manifests still in existence is summarized in Exhibit A to this Supplemental Response. MBI has no analyses or MSDS sheets for the wastes described in the summary.

2b. The annual quantity of each "waste" used or generated;

July 11, 2007 Response: MBI no longer has documentation that allows it to provide accurate records as to each waste or waste stream that it produced on an annual basis.

Supplemental Response: MBI has located a limited number of corporate records containing information as to annual volumes of waste generated. MBI has totaled the weight and volume of its wastes as shown in these documents that have survived and concludes that the waste generated each year was as follows:

1986: 440,576 pounds
1987: 161,872 pounds
1988: 7,745,502 pounds and 91,483 gallons
1989: 142,807 pounds
1990: 1,363,498 pounds
1991: 557,558 pounds
1992: 673,607 pounds and 6,029 gallons
1993: 709,276 pounds
1994: 396,359 pounds

2c. The process(es) in which each "waste" was used or the process(es) that generated each;

July 11, 2007 Response: Because of the wide range of chemicals manufactured over the years, MBI cannot reliably determine each process that generated waste or a waste stream. However, most of the waste generated by MBI was generated during the manufacturing process of specialty chemicals utilized in a variety of industries.

Supplemental Response: MBI has located no additional information requested by this subsection. However, please see MBI's Supplemental Response to Request No. 2a above.

2d. The types of containers used to treat, store or dispose of each "waste"; and

July 11, 2007 Response: MBI has never, to the best of its knowledge, treated its own waste, and has not stored waste except in short-term regulated storage areas at its manufacturing facility. To the best of its knowledge, MBI believes that its waste was stored and shipped in a variety of containers, including drums and smaller containers of varying size.

Supplemental Response: Manifests that have survived from 1986 through 1994 indicate that waste was sometimes shipped in metal drums, fiber/plastic boxes, plastic drums, wooden boxes, cylinders and in bulk.

2e. The method of treatment and/or disposal of each "waste."

July 11, 2007 Response: To the best of its knowledge, MBI's waste was incinerated at authorized facilities or landfilled at authorized landfills throughout the relevant time period.

Supplemental Response: Based on the documents mentioned in its Supplemental Response to Request No. 2b, MBI's waste during at least a portion of the years from 1986 through 1994 was either reclaimed, used for heat recovery, incinerated or land filled.

4. Describe the methods used by you to dispose of and/or treat "waste" during the period 1965 to 1999.

July 11, 2007 Response: MBI has not located any records prior to 1986 relating to methods used to dispose of its waste off-site or treat its waste. For the period after 1976, based on its and its predecessors' policies regarding waste disposal, and based on manifests that have survived from a portion of that period, MBI believes that its wastes were disposed of pursuant to regulations enacted by federal, state and local agencies with regulatory authority over waste disposal practices. To the best of its knowledge, MBI did not treat its own wastes at any point during the relevant time period. Disposal practice would have included contracting with transporters and/or waste treatment/waste disposal facilities to either treat or dispose of MBI's wastes pursuant to regulations relating to such treatment and/or disposal.

Supplemental Response: Based on the documents mentioned in its Supplemental Response to Request No. 2b, MBI's waste during at least a portion of the years from 1986 through 1994 was either reclaimed, used for heat recovery, incinerated or land filled.

5. If your response to Question 4 includes the contracting of a hauler or transporter to transport and/or dispose of wastes, explain the arrangements for those transactions and provide documentation that confirms the nature of those transactions.

July 11, 2007 Response: To the best of its knowledge, MBI contracted for the disposal of its waste during the relevant time period with third-party haulers and with treatment and/or disposal facilities. However, MBI has not located any records that would confirm the nature or bases of these transactions. Based upon appropriate inquiry, no current or former MBI employee and no existing records still in the possession of MBI indicate any relationship with Chem Fab for the disposal and/or treatment of any type of waste from MBI.

Supplemental Response: MBI has identified no additional information in response to this request. However, please see the information provided in Supplemental Response No. 6 and the summary attached hereto as Exhibit A.

6. Did you make arrangements with any of the following companies or individuals to transport and/or dispose of wastes? Manfred De Rewal, Echo

Corporation, Revere Chemical Company, Revere Chemical Transport, De Rewal Chemical Company, Inc. Boarhead Corporation, East Falls Corporation, Advanced Environmental Technology Corporation ("AETC"), the Envirotech Company, Environmental Chemical Control, Inc., Jonas Waste Removal, Marvin Jonas, Inc., Marvin Jonas, Simon Wrecking, Simon Resources, Inc., Sam Simon, Chem Fab Corporation, Hans Richard Becker, Gulbrandsen Co., Chemical Leaman Tank Lines, Inc., Coastal Tank Lines, Inc., Macs Associates, and Matlack Transportation Co.

July 11, 2007 Response: Yes.

If so, identify:
6a. The persons with whom you, or such other persons, made such arrangements;

July 11, 2007 Response: Based on its records, MBI made arrangements with Advanced Environmental Technology Corporation (a.k.a. "AETC") and Chemical Leaman Tank Lines Inc. for transportation of MBI's waste. However, none of the records still in existence indicate that any of the waste was disposed of or treated at the Site, and none of the records show any nexus whatsoever with the Chem Fab facility.

Supplemental Response: MBI has not identified any records or corporate knowledge regarding any specific persons at AETC or Chemical Leaman with whom any arrangements were made. However, MBI has provided in the summary attached as Exhibit A the names of those individuals (under the column "Hauler Employees") who signed manifests on behalf of Chemical Leaman. In addition, and to clarify its July 11, 2007 Response to Request 6a, MBI is without knowledge as to who actually chose specific disposal methods and/or disposal sites.

6b. Every date on which such arrangements took place;

July 11, 2007 Response: Records still in the possession of MBI do not show when said arrangements took place.

Supplemental Response: MBI has not identified any records or corporate knowledge as to when such arrangements took place. However, MBI has provided dates on the summary attached as Exhibit A on which specific disposal events may have taken place from 1986 through the end of 1994. None of the disposal events indicate disposal at the Chem Fab Site, and Chem Fab is not mentioned on any manifest or other document in MBI's possession.

6c. For each transaction, the nature and quantity of the "waste" including the chemical content, characteristics, physical state (i.e., liquid, solid), and the

process for which the substance was used or the process that generated the substance;

July 11, 2007 Response: MBI has some limited information in its records that may be responsive to this specific request. However, none of MBI's records contain any nexus whatsoever to the Chem Fab Site. MBI will disclose responsive records to the Agency upon notification by the Agency of the nexus for MBI's waste disposal activities to or at the Site. Otherwise, MBI objects that this request does not seek information regarding any hazardous substances, pollutants and/or contaminants as defined in CERCLA that were transported to, stored, treated, or disposed of at the Site.

Supplemental Response: After reviewing its own records again and the documents produced by EPA in response to MBI's FOIA, MBI still has not identified any record or corporate knowledge that would lead it to believe any waste generated by MBI was transported to, stored, treated, or disposed of at the Chem Fab Site. Therefore MBI continues its objection as set forth in MBI's Response to the request contained in this subsection. MBI further has no records or corporate knowledge as to what process produced the waste shown in MBI's records. MBI has included in the summary attached hereto as Exhibit A information as to generic waste names that were required by the Department of Transportation as well as annual volumes where AETC and/or Chemical Leaman were involved. Please also see MBI's response to Request 2a above.

6d. Precise locations at which each "waste" was disposed or treated;

July 11, 2007 Response: Please see MBI's response to Question No. 6c.

Supplemental Response: Neither the waste manifests nor any other documentary information or corporate knowledge indicates that any waste generated by MBI was transported to, stored, treated, or disposed of at the Chem Fab Site. See Exhibit A attached hereto.

6e. The persons who selected the Site as the place at which "waste" was disposed or treated;

July 11, 2007 Response: Please see MBI's response to Question No. 6c.

Supplemental Response: To the best of MBI's knowledge, no person selected the Chem Fab Site for disposal of any waste generated by MBI.

6f. The final disposition of each of the "wastes" involved in such transactions; and

July 11, 2007 Response: Please see MBI's response to Question No. 6c.

Supplemental Response: Please see MBI's supplemental response to Question No. 6c.

6g. The names of employees, officers, owners and agents for each transporter.

July 11, 2007 Response: Please see MBI's response to Question No. 6c.

Supplemental Responses: MBI has included in the summary attached hereto as Exhibit A the names of those Chemical Leaman employees who signed manifests on behalf of their employer. MBI has no additional information relating to other employees, officers, owners and agents for Chemical Leaman.

During the teleconferences held between MBI and EPA, it was determined that Request No. 8 was inadvertently included in the Supplemental Request to MBI. EPA informed MBI that it could disregard Request No. 8.

As previously stated, MBI will supplement this request if additional documents or information is discovered. If you have any questions concerning MBI's response to this Supplemental Information Request, please contact Patricia Duft or me at the above numbers.

Sincerely,

Karen Burke

Karen Burke
Director, Environmental Remediation

Enc (1)

Cc: Steven Siegel
Ann Bailey

Exhibit A

Chem Fab (Mallinckrodt Baker Yearly Spreadsheet)

ORIGINAL

| Dates That Involved Either AETC or Chemical Leaman | Containers Used during this calendar year, but not necessarily for waste hauled to AETC or by Chemical Leaman) | Destination Facility | Haulers/ Transporters | Wastes (These are wastes hauled during this calendar year, but they were not necessarily hauled to AETC or by Chemical Leaman) | Wastes (These are wastes hauled during this calendar year, but they were not necessarily hauled to AETC or by Chemical Leaman) | Wastes (These are wastes hauled during this calendar year, but they were not necessarily hauled to AETC or by Chemical Leaman) | Hauler Employees (All from Chemical Leaman) | Annual Volume hauled to AETC or by Chemical Leaman |
|---|---|---|---|---|---|---|---|---|
| ***1986***<br>Jan. 3, 10, 15, 21, 22, 27, 29, 30,<br>Feb. 4, 12, 21, 25, 28,<br>March 4, 7, 14, 18, 25,<br>April 1, 8, 15, 25,<br>May 20, 22, 30,<br>June 2, 3, 10,<br>July 1, 8, 15, 17, 22,<br>August 5, 9, 12, 19, 26, 28,<br>Dec. 9, 30 | (DM) Metal Drums<br>(CF) Fiber/Plastic Boxes<br>(DF) Plastic Drums<br>(CW) Wooden Boxes<br>(CY) Cylinders | One or More Haulers Transported a Portion of JT Baker's Waste to Advanced Environmental Technology Corp. | Chemical Leaman Hauled a Portion of JT Baker's Waste, but Never Hauled it to Advanced Envrionmental Technology Corp. | Waste Poisonous Solid<br>Waste Cyanide Mixture Dry Poison B<br>Hazardous Waste Liquid<br>Hazardous Waste solid<br>Waste Chemicals - DOT not-regulated<br>Waste Morpholine<br>Waste Flammable Liquid<br>Waste Flammable Solid<br>Waste Ammonium Sulfide Solution<br>Waste Oxidizer<br>Waste Flammable Liquid Poisonous<br>Waste Combustible Liquid<br>Waste Corrosive Liquid<br>Waste Alkaline (Corrosive) Liquid<br>Waste Dinitrophenol Solution<br>Waste Antimony Trioxide<br>Waste Chloroform | Waste Hexane<br>Waste Aluminum Sulfate Solid<br>Waste Acetic Acid<br>Waste Poison B Solid<br>Waste Nickle Hydroxide<br>Waste ORM-A<br>Waste Asbestos<br>Waste Ammonium Thiocyanate<br>Waste Hydrofluoric Acid Solution<br>Waste Fuel Oil<br>Waste Methylene Chloride<br>Waste Isopropanol<br>Waste Acetonitrile<br>Waste Ethyl Ether<br>Waste Petroleum Ether<br>Waste Ethyl Acetate | Waste Collodion<br>Waste Phenol<br>Waste Poison B Liquid<br>Waste Formaldehyde Solution<br>Waste Gasoline<br>Waste Compressed Gas<br>Waste Nickel Carbonyl<br>Waste Thionylchloride<br>Waste Phosphorous Trichloride<br>Waste Acetic Anhydride<br>Waste Sodium Metal<br>Waste Magnesium Metal<br>Waste Water Reactive Solid<br>Waste Hydrazine aqueous Solution | Robert Klein<br>Francis Stehle<br>G.M. Bagenstose<br>Merritt Burger | 441,046 Pounds<br>500 Pounds Returned<br>440,546 Net Pounds |

Exhibit A
Chem Fab (Mallinckrodt Baker Yearly Spreadsheet)

ORIGINAL

| Dates That Involved Either AETC or Chemical Leaman | Containers Used during this calendar year, but not necessarily for waste hauled to AETC or by Chemical Leaman) | Destination Facility | Haulers/ Transporters | Wastes (These are wastes hauled during this calendar year, but they were not necessarily hauled to AETC or by Chemical Leaman) | Wastes (These are wastes hauled during this calendar year, but they were not necessarily hauled to AETC or by Chemical Leaman) | Wastes (These are wastes hauled during this calendar year, but they were not necessarily hauled to AETC or by Chemical Leaman) | Hauler Employees (All from Chemical Leaman) | Annual Volume hauled to AETC or by Chemical Leaman |
|---|---|---|---|---|---|---|---|---|
| ***1987***<br>January 6, 7, 13, 20,<br>February 3, 10, 12<br>March 17,<br>April 9, 20, 30<br>May 11, 21,<br>June 12, 18, 26<br>July 2, 17, 30<br>August 4, 13,<br>September 4, 14, 17, 24<br>October 15, 30<br>November 5, 17, 23, 24, 25<br>December 1, 4, 17, 21 | (DM) Metal Drums<br>(CF) Fiber/Plastic Boxes<br>(CW) Wooden Boxes<br>(DF) Plastic Drums | One or More Haulers Transported a Portion of JT Baker's Waste to Advanced Environmental Technology Corp. | Chemical Leaman Hauled a Portion of JT Baker's Waste, but Never Hauled it to Advanced Envrionmental Technology Corp. | Waste Chemicals - DOT Non-Regulated<br>RQ Waste Ethyl Ether<br>Waste Flammable Liquid<br>Waste Flammable Liquid Corrosive<br>Waste Nitric Acid - Oxidizer<br>Waste Oxidizer<br>Waste Bromine Corrosive Material<br>Waste Corrosive Liquid<br>Waste Alkaline (corrosive) liquid<br>RQ Waste Poison B Solid<br>Waste Flammable Solid<br>Waste Ethylenediamine<br>Waste Poison B Liquid<br>Waste Arsenic Trioxide, Solid Poison B<br>Waste ORM - A<br>Waste Chloroform<br>Waste Hazardous Waste Liquid<br>Waste Isopropanol<br>Waste Phosphorous Acid<br>Waste Phosphorous Oxychloride<br>Waste Phosphorous Trichloride<br>Waste Hydrofluoric Acid Solution | Waste Corrosive Solid<br>Waste Cyanogen Bromide<br>Waste Hydrocyanic Acid<br>Waste Oil - Combustible Liquid<br>Waste Phosphoric Liquid<br>Waste Dioxane<br>Waste Sodium Peroxide Oxidizer<br>Waste Water Reactive Solid-Flammable<br>Waste Picric acid wet w/not less than 10% water<br>Hazardous Waste Solid<br>Waste Benzoyl Chloride-Corrosive Material<br>Waste Nitric Acid<br>Waste Trichloroaletic Acid - Solid<br>Waste Cyanide Mixture Dry Poison B<br>Waste Cyanide Solution - Poison B<br>Waste Arsenic Pent oxide Solid Poison B<br>Waste ORM B<br>Hazardous Waste Liquid - Ammonium Thiocyanate<br>RQ Waste Dioxane<br>Waste Trimethylchlorosilane<br>Waste Magnesium, metal<br>Waste Sodium, Metal<br>Waste Octadecyltrichlorosilane | Waste Pyridine Flammable Liquid<br>Waste Acetyl Chloride<br>Waste Phosphorous Amorphons<br>Waste Sodium Hydride<br>RQ Waste Silver Nitrate<br>Waste Barium Nitrate<br>RQ Waste Mercury based solid<br>RQ Waste Asbestos<br>Waste Mercuric Nitrate<br>Waste Sulfurous Acid<br>Waste Ferrous Sulfate<br>Waste Tert-Butyl Hydro peroxide<br>Methyl Ethyl Ketone<br>Cyclconexane<br>Barium Nitrate topped with Vermiculite<br>Chromium Trioride, Potassium Permangamate, Chromium Oxide<br>Ammonium Hydroxide<br>Waste Crotonaldenycle - Flammable Liquid<br>Waste Acetuidehyde - Flammable Liquid<br>Waste Carbon Tetrachloride | Jesse Harrison | 161,872 Pounds |

Exhibit A
Chem Fab (Mallinckrodt Baker Yearly Spreadsheet)

| Dates That Involved Either AETC or Chemical Leaman | Containers Used during this calendar year, but not necessarily for waste hauled to AETC or by Chemical Leaman) | Destination Facility | Haulers/ Transporters | Wastes (These are wastes hauled during this calendar year, but they were not necessarily hauled to AETC or by Chemical Leaman) | Wastes (These are wastes hauled during this calendar year, but they were not necessarily hauled to AETC or by Chemical Leaman) | Wastes (These are wastes hauled during this calendar year, but they were not necessarily hauled to AETC or by Chemical Leaman) | Hauler Employees (All from Chemical Leaman) | Annual Volume hauled to AETC or by Chemical Leaman |
|---|---|---|---|---|---|---|---|---|
| ***1988***<br>January 6, 14, 18, 27, 29<br>February 17<br>March 4, 9, 30<br>April 11, 19, 20<br>May 11,<br>June 1, 22,<br>July 13, 26, 28<br>August 1, 3, 24,<br>September 22, 28<br>October 26<br>November 16<br>December 6, 7, 15, 22 | (DM) Metal Drums<br>(CF) Fiber/Plastic Boxes<br>(CW) Wooden Boxes<br>(DF) Plastic Drums<br>(TT) Cargo Tanks | One or More Haulers Transported a Portion of JT Baker's Waste to Advanced Environmental Technology Corp. | Chemical Leaman Hauled a Portion of JT Baker's Waste, but Never Hauled it to Advanced Envrionmental Technology Corp. | Waste Hydrofluoric Acid<br>Waste Sulfurous Acid<br>Waste Formic Acid<br>Waste Chromic Acid<br>RQ Waste Corrosive Liquid<br>Waste Corrosive Liquid<br>Waste Poisonous Solid, Corrosive Poison B<br>RQ Hazardous Waste Solid<br>Hazardous Waste Solid<br>Waste, Harzardous Substance Solid<br>Waste Chemicals DOT Non-Regulated<br>RQ Waste Flammable Solid<br>RQ Waste Oxidizer<br>Waste Dichloromethane<br>RQ Hazardous Substance (Asbestos)<br>RQ Waste Flammable Liquid<br>RQ Waste Ethyl Ether<br>Waste Oxidizer<br>Waste Antimony Trichloride<br>Waste Selenium Oxide Poison B<br>Waste Propionic Acid<br>Waste Arsenic Acid, Solid Poison B<br>Waste Strychine Salt, Solid Poison B<br>Waste Copper chloride | RQ Waste Poison B Solid<br>Waste Poison B Solid<br>Waste Flammable Liquid<br>Waste Nitric Acid, Fuming Oxidizer<br>Waste Bromine, Corrosive Material<br>Waste Poison B Liquid<br>Waste Corrosive Solid<br>Waste Flammable Solid<br>Waste Antimony Potassium Tartrate<br>Waste ORM B<br>Waste Hydrochloric Acid<br>Waste Alkaline Corrosive Liquid<br>Waste Mercuric Acetate<br>Waste Sodium Hydroxide, Dry Solid<br>Waste Petroleum Ether<br>Waste Pyridine Flammable Liquid<br>Waste Hydrogen Peroxide Solution<br>Waste Phosphorus Oxychloride<br>Waste Phosphorus Trichloride<br>Waste Thionyl Chloride - Corrosive<br>Waste Nitrate, No Oxidizer<br>Waste Phosphoric Anhydride<br>Waste Hydrobromic Acid<br>Waste Hypochlorite Solution | Waste Cyanide Solution- Poison B<br>Waste Cyanide Mixture - Poison B<br>Waste Zinc Nitrate<br>Hazardous Waste Liquid ORM E<br>Waste Water Reactive Solid<br>Waste Sodium Azide Poison B<br>Waste Methylene Chloride<br>Waste Formaldehyde Solution<br>Waste ORM A<br>Waste Oil - Combustible Liquid<br>NON RCRA Solid - DOT Not Regulated<br>Waste Benzoyl Chloride<br>Waste Aluminum Chloride<br>Waste Potassium Fluoride<br>RQ Waste Ammonium Persulfate Oxidizer<br>Waste Nitric Acid (over 40%)<br>Waste Cyanide Mixture Dry Poison B<br>Waste Carbon Tetrachloride<br>Waste Diethylamine<br>Waste Calcium Carbide<br>Waste Sodium Sulfide<br>Waste Silicon TetraChloride<br>Waste Styrene Monomer, Inhibited<br>Waste Paint<br>Waste Dioxane<br>Waste Hydrazine, Anhydrous<br>Waste Silver Nitrate | M. Allen<br>Fred Polgar | 253,852 Pounds |

Exhibit A
Chem Fab (Mallinckrodt Baker Yearly Spreadsheet)

| Dates That Involved Either AETC or Chemical Leaman | Containers Used during this calendar year, but not necessarily for waste hauled to AETC or by Chemical Leaman) | Destination Facility | Haulers/ Transporters | Wastes (These are wastes hauled during this calendar year, but they were not necessarily hauled to AETC or by Chemical Leaman) | Wastes (These are wastes hauled during this calendar year, but they were not necessarily hauled to AETC or by Chemical Leaman) | Wastes (These are wastes hauled during this calendar year, but they were not necessarily hauled to AETC or by Chemical Leaman) | Hauler Employees (All from Chemical Leaman) | Annual Volume hauled to AETC or by Chemical Leaman |
|---|---|---|---|---|---|---|---|---|
| ***1989***<br>January 4, 11, 18, 25<br>February 22<br>March 8, 29<br>April 19<br>May 1, 31<br>June 12<br>July 12<br>August 2, 24, 29<br>October 4<br>November 15<br>December 11, | (DM) Metal Drums<br>(CF) Fiber/Plastic Boxes<br>(CW) Wooden Boxes<br>(DF) Plastic Drums | One or More Haulers Transported a Portion of JT Baker's Waste to Advanced Environmental Technology Corp. | Chemical Leaman Hauled a Portion of JT Baker's Waste, but Never Hauled it to Advanced Envrionmental Technology Corp. | Waste Nitromethane<br>Waste Flammable Liquid<br>Waste Flammable Liquid - Corrosive<br>Waste Oxidizer<br>Waste Oxidizer Corrosive Solid<br>Waste Sodiume Methylate, Dry<br>Waste Flammable Solid<br>Waste Bromine-Corrosive Material<br>Waste ORM-A<br>Waste Combustible Liquid<br>Hazardous Waste Solid<br>Waste Chemical - DOT Non-Regulated<br>Waste Sodium Azide Poison B<br>*Waste Poison B Solid*<br>Waste Compressed Gas<br>Waste Acetyl Chloride<br>Waste Water Reactive Solid<br>Waste Titanium Tetrachloride<br>Waste Corrosive Liquid<br>Waste Alkaline (Corrosive) Liquid<br>Waste Zirconium Tetrachloride | RQ Hazardous Waste Solid<br>Waste Dichloromethane<br>Waste Ammonium Fluoride<br>Waste Potassium Hydrogen Sulfate<br>Waste ORM-B<br>Hazardous Substance Solid<br>RQ Waste Flammable Solid<br>Waste Nitrate<br>Waste Benzoyl Chloride<br>Waste Zinc Nitrate<br>Waste Corrosive Liquid - Poisonous<br>Waste Thionyl Chloride - Corrosive<br>Waste Nitrobenzene, Liquid Poison B<br>*Waste Oil, Combustible Liquid*<br>RQ Waste Potassium Dischromate<br>Waste Sulfur Solid<br>RQ Waste Dioxane<br>Waste Sulfurous Acid<br>Waste Hydrazine Aqueous Solution<br>Waste Poison B Liquid<br>Waste Hydrofluoric Acid Solution | Waste Carbon Disulfide<br>Waste Ferric Nitrate, Oxidizer<br>State Hazardous Waste Solid<br>Waste Paint - Flammable Liquid<br>Waste Arsenic Solid, Poison B<br>Waste Acetal Chloride<br>Waste Phosphorous Amorphous Red<br>Waste Sodium Hydride<br>Waste cyanide Mixture, Dry - Poison B<br>Waste Trimethyl Chlorosilane<br>Waste Ammonium Persulfate - Oxidizer<br>Waste Calcium Carbide<br>*Waste Silicon Tetra Chloride*<br>Waste Phosphoric Anhydride<br>Waste Selenium Oxide Poison B<br>Waste Formic Acid<br>Waste Phosphorous Trichloride<br>Waste Phosphorus Oxychloride<br>Waste Aniline Oil, Liquid | Fred Polgar<br>Frank Koskovich | 142,882 Pounds<br>75 Pounds Returned<br>142,807 Net Pounds |

| Dates That Involved Either AETC or Chemical Leaman | Containers Used during this calendar year, but not necessarily for waste hauled to AETC or by Chemical Leaman) | Destination Facility | Haulers/ Transporters | Wastes (These are wastes hauled during this calendar year, but they were not necessarily hauled to AETC or by Chemical Leaman) | Wastes (These are wastes hauled during this calendar year, but they were not necessarily hauled to AETC or by Chemical Leaman) | Wastes (These are wastes hauled during this calendar year, but they were not necessarily hauled to AETC or by Chemical Leaman) | Hauler Employees (All from Chemical Leaman) | Annual Volume hauled to AETC or by Chemical Leaman |
|---|---|---|---|---|---|---|---|---|
| ***1990***<br>March 21<br>May 2, 14, 30<br>July 25, 26<br>September 5,<br>October 10<br>November 14 | (CW) Wooden Boxes<br>(DF) Plastic Drums<br>(DT) Dump Truck<br>(DM) Metal Drums<br>(CF) Fiber/Plastic Boxes | One or More Haulers Transported a Portion of JT Baker's Waste to Advanced Environmental Technology Corp. | Chemical Leaman Did Not Haul Any Waste from JT Baker. | Hazardous Solid Waste<br>RQ Waste Cyanide Mixture Dry<br>Waste Irritating Agent<br>Waste ORM A<br>Waste Flammable Liquid<br>Waste Nitromethane<br>Waste Dioxane<br>Waste Carbon Disulfide<br>Waste Proplylene Oxide<br>Waste Acetyl Chloride<br>Waste Flammable Liquid - Corrosive<br>Waste Oxidizer<br>Waste Flammable Solid<br>Waste Sodium Hydrosulfite<br>Waste Lithium Hydride<br>Waste Corrosive Liquid<br>Hazardous Waste Liquid ORM-E<br>Hazardous Waste Solid ORM-E<br>RQ Waste Flammable Liquid<br>Waste Sodium Nitrate | Waste Water Reactive solid<br>Waste Magnesium Metal<br>Waste Alkaline Corrosive Liquid<br>Waste Poison B Liquid<br>Waste Poison B Solid<br>RQ Hazardous Substance Solid ORM-E<br>Waste Ethylene Glycol (Combustible Liquid)<br>Waste Sulfur Solid<br>Waste Chemicals - DOT Non-Regulated<br>Waste Flammable Liquid - Poisonous<br>Waste Nitrate Oxidizer<br>Waste Phosphorous Amorphous<br>Waste Bromine<br>Waste Corrosive Liquid - Poisonous<br>Waste Sodium Azide<br>Waste Aluminum Chloride | Waste Corrosive Solid<br>Waste ORM B<br>Waste Thionyl Chloride - Corrosive<br>Waste Trimethylchlorosilane<br>Waste Dinitrorenzene Solid, Poison B<br>Waste Phosphoric Anhydride<br>Waste Pyropohoric Liquid<br>Waste Hydrazine Aqueous Solution<br>Waste Collodion-Flammable Liquid<br>Waste Insecticide Liquid<br>Waste Carbon Disulfide<br>Waste Strontium Nitrate<br>Waste Ammonium Persulfate<br>Waste Potassium Perchlorate<br>Waste Naphtnalene ORM-A<br>Waste Oil - Combustible Liquid<br>Waste Silver Nitrate<br>Waste Mercury Compound Solid | | 37,291 Pounds |

Exhibit A
Chem Fab (Mallinckrodt Baker Yearly Spreadsheet)

| Dates That Involved Either AETC or Chemical Leaman | Containers Used during this calendar year, but not necessarily for waste hauled to AETC or by Chemical Leaman) | Destination Facility | Haulers/ Transporters | Wastes (These are wastes hauled during this calendar year, but they were not necessarily hauled to AETC or by Chemical Leaman) | Wastes (These are wastes hauled during this calendar year, but they were not necessarily hauled to AETC or by Chemical Leaman) | Wastes (These are wastes hauled during this calendar year, but they were not necessarily hauled to AETC or by Chemical Leaman) | Hauler Employees (All from Chemical Leaman) | Annual Volume hauled to AETC or by Chemical Leaman |
|---|---|---|---|---|---|---|---|---|
| ***1991***<br>January 16<br>February 27<br>April 9, 15<br>May 8, 22<br>June 7<br>August 14<br>November 6 | (CW) Wooden Boxes<br>(DF) Plastic Drums<br>(DM) Metal Drums | One or More Haulers Transported JT Baker's Waste to Advanced Environmental Technology Corp. | Chemical Leaman Did Not Haul Any Waste from JT Baker. | RQ Waste Tetrachloroethylene<br>RQ Waste Trichloroethylene<br>RQ Waste Trichloroethane<br>Waste ORM A<br>Waste Chemicals - DOT Non-Regulated<br>Waste Dioxane<br>Waste Flammable Liquid, Corrosive<br>Waste Flammable Solid (Acetone/Ethyl Acetate)<br>Waste Chronic Acid Solution<br>Waste Hydrobromic Acid<br>Waste Phosphorus Oxychloride<br>Waste Aluminum Chloride<br>RQ Waste ORM A<br>Waste Dichloromethane<br>Waste Octadecytrichlorosilane<br>Waste Corrosive Solid<br>Waste Combustible Liquid<br>Waste Sodium Metal | Waste Flammable Solid<br>Waste Chlorosulfonic Acid<br>Waste Hydrazine, Aqueous Solution<br>Waste Phosphorous Penta Chloride<br>Waste Corrosive Liquid, Poisonous<br>Waste Corrosive Liquid<br>Waste Poisonous Solid, Corrosive, Poison B<br>Waste Poison B Solid<br>Waste ORM B<br>Waste Oil (Motor)<br>Hazardous Waste Solid<br>RQ Hazardous Substance Solid<br>Waste Benzoyl Peroxide<br>Waste Acetaldehyde - Flammable Liquid<br>Waste Flammable Liquid<br>Waste Flammable Solid (Methanol) | Waste Sodium Hydride<br>Waste Phenol<br>Waste Poison B Liquid<br>State Hazardous Waste Solid<br>Waste Cyanide Solution<br>Waste Ammonium Persulfate-Oxidizer<br>Waste Lead Nitrate<br>Waste Oxidizer<br>Waste Sodium Peroxide Oxidizer<br>Waste Flammable Solid (100% activated Carbon)<br>Waste Flammable Solid (2-propanol, ethyl acetate)<br>Waste Water Reactive Solid<br>Waste Copper Chloride<br>Waste Sodium Dichromate<br>Waste Sulfur, Solid<br>Waste Mercuric Nitrate<br>Waste Alkaline (Corrosive) Liquid<br>Waste Chromic Acid Solution<br>Waste Nitric Acid, 40% or Less<br>Waste Mercuric Oxide, Solid<br>RQ Waste Copper Chloride | | 26,990 Pounds |
| ***1992*** | (DT) Dump Truck<br>(TT) Cargo Tanks<br>(DM) Metal Drums | | | Non- Regulated Material<br>RQ Waste Flammable Liquid<br>Fuel & Water Mix<br>Waste Combustible Liquid<br>Waste Petroleum Naphtha<br>Waste Solidified Tar & Oil<br>RQ Waste Alkaline Liquid | | | | 45,365 Pounds |

ORIGINAL

Exhibit A
Chem Fab (Mallinckrodt Baker Yearly Spreadsheet)

ORIGINAL

| Dates That Involved Either AETC or Chemical Leaman | Containers Used during this calendar year, but not necessarily for waste hauled to AETC or by Chemical Leaman) | Destination Facility | Haulers/ Transporters | Wastes (These are wastes hauled during this calendar year, but they were not necessarily hauled to AETC or by Chemical Leaman) | Wastes (These are wastes hauled during this calendar year, but they were not necessarily hauled to AETC or by Chemical Leaman) | Wastes (These are wastes hauled during this calendar year, but they were not necessarily hauled to AETC or by Chemical Leaman) | Hauler Employees (All from Chemical Leaman) | Annual Volume hauled to AETC or by Chemical Leaman |
|---|---|---|---|---|---|---|---|---|
| ***1993***<br>April 14<br>July 7<br>November 10<br>December 3 | (DF) Plastic Drums<br>(DM) Metal Drums | One or More Haulers Transported JT Baker's Waste to Advanced Environmental Technology Corp. | Chemical Leaman Did Not Haul Any Waste from JT Baker. | Waste Organic Peroxide<br>Waste Flammable Liquids, Poisonous<br>Waste Flammable Solids<br>RQ Waste Self Heating Substances<br>Hazardous Waste Solid (Trichlorophenol)<br>Compressed Gases<br>Waste Flammable Liquids<br>Waste Diethylamine<br>RQ Waste Flammable Liquids, Poisonous<br>Waste Oxidizing Substances, Solid, Corrosive | Waste Chromium Tioxide, Anhydrous<br>Beryllium Powder<br>Waste Poisonous Liquid<br>Waste Poisonous Solids<br>Waste Trichloroethane<br>Corrosive Solids<br>Waste Corrosive Liquids<br>Waste Trifluoroacetic Acid<br>Combustible Liquid - Motor Oil, Machine Oil<br>Chemicals - DOT non regulated<br>State Hazardous Solid - DOT Non Regulated<br>Waste Sulfur<br>Waste Sodium Arsenate<br>Waste Sodium Azide Poison | RQ Waste Poisonous Liquids<br>Waste Dichloromethane<br>Waste Bromine<br>Waste Aluminum Chloride<br>Waste Phenyltrichlorosilane<br>Other Regulated Substances, Solid<br>RQ Environmentally Hazardous Substance Solid<br>Waste Carbon Disulfide<br>Waste Dioxane<br>Waste Oxidizer | | 15,725 Pounds |
| ***1994***<br>August 10,<br>October 17<br>December 14 | (DM) Metal Drums<br>(DF) Plastic Drums<br>(CF) Fiber/Plastic Boxes | One or More Haulers Transported JT Baker's Waste to Advanced Environmental Technology Corp. | Chemical Leaman Did Not Haul Any Waste from JT Baker. | Waste Flammable Liquids<br>Waste Picric Acid<br>Waste Sulfur<br>Waste Oxidizing Substances Solid<br>Waste Poisonous Liquids<br>Waste Mercury Acetate<br>RQ Waste Poisonous Solids<br>Waste Corrosive Liquids<br>Waste Phosphorus Oxychloride<br>Waste Phosphorus Trichloride<br>Waste Caustic Alkali Liquids<br>Waste Carbon Activated Compressed Gases<br>Waste Carbon Disulfide<br>Waste Substance which in contact w/water emit flammable gases, solid | Waste Sodium Borohydride<br>Waste Oxidizing Substances Liquid<br>Waste Perchloric Acid<br>Waste Ammonium Dichromate<br>RQ Waste Poisonous Liquids<br>Waste Nitrobenzene<br>RQ Waste Ethylene Dibromide<br>Waste Poisonous Solids<br>Waste Corrosive Solids<br>RQ Waste Mercury | | | 1,550 Pounds |
| | | | | | | | | |